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May 14, 2025

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF & EMAIL

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday ("Hlday") is currently at liberty on a bond that contains numerous conditions including travel restrictions. Hlday's mother recently had surgery and needs some assistance at her home. Additionally, Hlday's daughter is graduating from college and he wants to take his mother to the graduation. For these reasons, Hlday respectfully requests permission to travel to New York and to stay with mother on Long Island from May 17, 2025 through May 20, 2025. On May 18, 2025, Hlday also requests permission to travel to Rhode Island with his mother for the day to attend his daughter's graduation ceremony in Rhode Island. The government, by Assistant United States Attorney Jonathan Lax, and Pretrial, by Pretrial Officer Valeria Lopez consent to these applications.

Thank you for Your Honor's consideration of these requests.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Jonathan Lax (by ECF & email)
EDNY Pretrial EM Unit (by email)
USPO Jason Roberts (by email)